

TAB J

DANIEL P. LIEBER

vs

MARQUIS MANAGEMENT

Docket No. 1:21-cv-968-JL

JON MARQUIS

December 15, 2022



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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

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DANIEL P. LIEBER,

Plaintiff,

v.

MARQUIS MANAGEMENT, LLC
and SELECT DEMO SERVICES, LLC,

Defendants.

* * * * *

Docket No.
1:21-cv-968-JL

DEPOSITION OF JON MARQUIS

Zoom deposition taken by agreement of counsel on
Thursday, December 15, 2022, commencing at 9:28 a.m.

Court Reporter: (Via Zoom)

Michele M. Allison, LCR, RPR, CRR
LCR #93 (RSA 310-A:161-181)

1 human resources or you just do whatever you want?

2 MS. ZACCARDELLI: Objection to the form.

3 Q. You may answer.

4 A. I very seldom terminate anyone at this point. I'm
5 semiretired. Yeah, I would certainly discuss it with Scott.

6 Q. Okay. So you discussed the termination of Dan
7 Lieber with Scott Watkins before you did it?

8 A. Yes.

9 Q. Tell me what you discussed with Mr. Watkins.

10 A. It's been a while, so my recollection isn't great,
11 but I discussed the reason why, and we discussed when.

12 Q. Okay. So tell me what you said to him and what he
13 said to you and everything you can recall in the discussion
14 that you had with Scott Watkins before you terminated
15 Mr. Lieber.

16 A. We terminated Mr. Lieber because he continued to
17 ask about my succession planning. That was the discussion.
18 I'm not quite sure what Scott said back to me. Again, it's
19 been a while.

20 Q. Okay. So I'm sorry, are you telling me that you
21 went and met with Scott Watkins and told him, I want to
22 terminate Dan Lieber, because he is constantly asking me
23 about my succession planning?

1 you're asking, maybe that's not the best question. I'm not
2 sure.

3 Q. Okay. Well, no one ever told you that Dan was
4 incompetent at any point during his employment with your
5 company, correct?

6 MS. ZACCARDELLI: Objection to form.

7 A. I don't believe so.

8 Q. Okay. And, sir, the only reason that Mr. Lieber
9 was terminated was because he asked about your succession
10 plan; is that right?

11 A. That, and not being able to stay within his own
12 lane, which that fell into.

13 Q. Okay. So the fact that he was asking about permits
14 and sprinkler heads and things like that, those were also the
15 additional sorts of things that caused you to want to
16 terminate his employment, correct?

17 A. The last question to my sister was the last --
18 literally, the last straw.

19 Q. Sir, I understand that, but can you answer my
20 question?

21 MS. BURNS: Can you read the question again,
22 Michele, please?

23 (The record was read as requested.)